

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (TRENTON)**
Caption in compliance with D.N.J. LBR 9004-1(b)

HALPERIN BATTAGLIA BENZIJA, LLP

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*Co-Counsel to The Blue Cross Blue Shield
Association*

In re:

LTL Management LLC,

Debtor.

Case No.: 23-12825 (MBK)

Chapter 11

Judge: Hon. Michael B. Kaplan

APPLICATION FOR ADMISSION OF THOMAS M. SOBOL *PRO HAC VICE*

The undersigned hereby seeks an Order granting the admission *pro hac vice* of Thomas M. Sobol of the law firm of Hagens Berman Sobol Shapiro LLP, to practice before this Court in connection with the above-captioned case and proceeding. This application (the “Application”) is submitted pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey. Unless requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, the Applicant hereby represents as follows:

1. I am an attorney with Halperin Battaglia Benzija, LLP (“HBB”), which law firm maintains an office at 40 Wall Street, 37th Floor, New York, New York 10005. HBB has been retained to serve as co-counsel for The Blue Cross Blue Shield Association in connection with the above-captioned bankruptcy case.

2. I am an attorney-at-law of the State of New Jersey and am admitted to practice before the United States District Courts for New Jersey.

3. I submit this Application, pursuant to Civ. Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of New Jersey, in support of an Order Approving Admission, *Pro Hac Vice*, of Thomas M. Sobol, Esq.

4. Mr. Sobol is an attorney with the law firm of Hagens Berman Sobol Shapiro LLP, which maintains an address of 1 Faneuil Hall Square, 5th Floor, Boston, Massachusetts 02109.

5. Attached is a certification of Mr. Sobol in which he certifies that he is, and has been, a member in good standing of the bar of the State of Massachusetts since 1983, and is admitted to practice in the United States District Court for the District of Massachusetts; the United States Court of Appeals for the First Circuit, Second Circuit, Third Circuit, Fourth Circuit, Fifth Circuit, Seventh Circuit, Ninth Circuit, Eleventh Circuit; the United States Tax Court; and the United States Supreme Court. Additionally, Mr. Sobol certifies that he is, and has remained, a member in good standing of said bars at all times, that no disciplinary proceedings are pending against him in any jurisdiction and no discipline has previously been imposed on him in any jurisdiction.

6. Mr. Sobol is familiar with the circumstances surrounding the above-captioned case and the applicable law, and his presence will serve the best interests of the client.

WHEREFORE, Applicant respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of Thomas M. Sobol, Esq. to represent The Blue Cross Blue Shield Association as counsel in connection with the above-captioned case.

Dated: April 7, 2023

HALPERIN BATTAGLIA BENZIJA, LLP

/s/ Walter Benzija

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